

Hearing Date: April 28, 2009 at 10:00 a.m.
Objection Deadline: April 21, 2009

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

Case No. 08-35653-KRH

CIRCUIT CITY STORES, INC., et al.,

Chapter 11 (Jointly administered)

Debtors.

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE THAT Geenen DeKock Properties, L.L.C. ("Landlord") has filed with the Court A Motion Of Landlord, Geenen Dekock Properties, L.L.C. for Order Allowing And Compelling Payment of Administrative Expense Claim Under 11 U.S.C. § 503(B) and Post-Petition Lease Obligation Under 11 U.S.C. §365(D)(3) (the "Motion"). A copy of the Motion has been filed with the Court and forwarded to you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 4001-(a)-1, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the following steps:

1. File with the Court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before **April 21, 2009 at 5:00 p.m.**

William C. Redden, Clerk
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

Paul K. Campsen, Esq.
VSB No. 18133
Kaufman & Canoles, a
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150 West Main Street (23510)
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Tele: (757) 624-3000
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Terrance A. Hiller, Esq.
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25800 Northwestern Highway, Suite 950
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Tele: (248) 357-0000
Fax: (248) 357-7488

Co-Counsel for Geenen DeKock Properties, LLC

You must also deliver a copy to all parties on the Certificate of Service below and to:

Counsel for Circuit City Stores, Inc.
Douglas M. Foley, Esq.
McGuireWoods LLP
9000 World Trade Center
101 W. Main St.
Norfolk, VA 23510

Counsel for Official Committee of Unsecured Creditors
Brad R. Godshall, Esq.
Pachulski Stang Ziehl & Jones, LLP
10100 Santa Monica blvd, 11th Floor
Los Angeles, CA 90067-4100

Co-Counsel for Google, Inc.
Paul K. Campsen, Esq.
Ann K. Crenshaw, Esq.
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Norfolk, VA 23510

David M. Blau, Esq.
Kupelian Ormond & Magy, P.C.
25800 Northwestern Highway, Suite 950
Southfield, MI 48075

2. Attend the hearing scheduled for **April 28, 2009 at 10:00 a.m.** before the Honorable Kevin R. Huennekens, U.S. Bankruptcy Court, Room 5000, United States Courthouse, 701 E. Broad Street, Richmond, Virginia 23219.

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: April 8, 2009.

GEENEN DEKOCK PROPERTIES, L.L.C.

By: /s/ Paul K. Campsen

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Tele: (248) 357-0000

Co-Counsel for Geenen DeKock Properties,
L.L.C.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Notice of Motion and Hearing was sent on this 8th day of April, 2009, to all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system.

/s/ Paul K. Campsen

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